

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SABRINA FLOWERS,)	
)	
Plaintiff,)	Case No. 08 C 00449
)	
v.)	Hon. George M. Marovich
)	
SOUTH WESTERN MOTOR SALES, INC. dba)	Magistrate Judge Geraldine Soat Brown
TOYOTA SCION ON WESTERN and)	
SANTANDER CONSUMER USA INC. dba)	
DRIVE FINANCIAL SERVICES,)	
)	
Defendants.)	

**MOTION OF DEFENDANT, SANTANDER CONSUMER USA
INC. DBA DRIVE FINANCIAL SERVICES FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, SANTANDER CONSUMER USA INC. dba DRIVE FINANCIAL SERVICES (“Drive”), by its attorneys, David J. Frankel, Esq. and the law firm of Sorman & Frankel, Ltd., respectfully requests this Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Fed. R. Civ. P. 6(b) (West 2007), and such other Rules as may apply, to enter an Order granting Drive an extension of time to answer or otherwise plead in response to Plaintiff’s, SABRINA FLOWERS (“Plaintiff”), Complaint (the “Complaint”). In support thereof, Drive states as follows:

1. Plaintiff filed her Complaint on or about January 22, 2008.
2. On January 22, 2008, Plaintiff caused a Summons to be issued to Drive. Drive was served with the Summons and Complaint through its registered agent in Illinois, on January 25, 2008.

3. Based on the foregoing, Drive has only recently retained counsel to handle this matter on its behalf and, therefore, counsel respectfully requests this Court to grant it additional time to investigate the facts of this matter to determine Drive's proper response to the Complaint.

4. Accordingly, Drive respectfully requests this Court to enter an Order granting it an additional twenty-eight (28) days in which to answer or otherwise plead in response to the Complaint.

5. Drive's undersigned counsel hereby certifies that on February 11, 2008, he conducted a telephonic conference with Plaintiff's counsel, Keith J. Keogh, Esq., and during that discussion, Mr. Keogh advised that he has no objection to the extension of time sought herein.

WHEREFORE, Defendant, Santander Consumer USA Inc. dba Drive Financial Services, respectfully requests this Court to enter an Order granting it an additional twenty-eight (28) days to answer or otherwise plead in response to Plaintiff's Amended Complaint; and, for such other, further and different relief as this Court deems just and proper.

Dated: February 12, 2008.

Respectfully submitted,

SANTANDER CONSUMER USA INC. dba
DRIVE FINANCIAL SERVICES,
Defendant,

By: /s/ David J. Frankel
One of its attorneys

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